

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

SHIRLEY CRAWFORD, MATTHEW
JORDAN, MELISSA ALEJANDRO,
NICOLA SOBERS, JANICE BUTLER,
PAULINE DION, LISA SAGHY, and
RICHARD ANGEMI, individually and on
behalf of all those similarly situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA,
INC., and SAMSUNG ELECTRONICS CO.,
LTD.,

Defendants.

Civil Action No. 2:22-cv-02828 (MCA)
(AME)

**DECLARATION OF JASON L.
LICHTMAN IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' REQUEST FOR
PHASED DISCOVERY**

JASON L. LICHTMAN hereby declares as follows:

1. I am an attorney licensed to practice law in New Jersey and a partner at the law firm of Lieff Cabraser Heimann & Bernstein. I am co-counsel for Plaintiffs in the above matter.
2. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.
3. Since Plaintiffs filed a Second Amended Complaint on September 26, 2023 (Dkt. 36), Lieff Cabraser Heimann & Bernstein, LLP has executed attorney representation agreements with two additional individuals, one from New Jersey and another from Illinois.
4. Plaintiffs are prepared to amend the operative complaint with the allegations of those two additional individuals, who allege they are members of the Nationwide Class and experienced cooling problems similar to those alleged by the Named Plaintiffs.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on: November 8, 2023

A handwritten signature in black ink, appearing to read 'Jason L. Lichtman', written over a horizontal line.

Jason L. Lichtman